

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

THOMAS KELLEY,	CIVIL ACTION NO.: 05 10596 NMG
Plaintiff,)
)
VS.)
)
TOWN OF PLYMOUTH and)
ROBERT J. POMEROY, as Chief of the)
Plymouth Police Department and)
Individually,)
Defendants.)

JOINT MOTION TO EXTEND SCHEDULING ORDER DEADLINES

Now come the parties in the above-captioned matter, and jointly request this Honorable Court to extend the deadlines of its current Scheduling Order by 60 days (including discovery and filing of dispositive motions).

As reasons for this motion, counsel for the defendants and plaintiff state they require the additional time to complete depositions and discovery. Due to scheduling conflicts, there are noticed depositions that have not yet been taken (including completing the plaintiff's suspended deposition due to his counsel's schedule). Furthermore, the plaintiff's attorney will be out of the state for most of the month of April.

The parties will not be prejudiced by this proposed extension. Therefore, the parties respectfully request that this Court allow the extension.

PLAINTIFF,
THOMAS KELLEY,
By his attorney,

Respectfully submitted,
DEFENDANTS,
ROBERT J. POMEROY and the
TOWN OF PLYMOUTH,
By their attorneys,

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